

**I-5, SR 502 INTERCHANGE PROJECT
CLARK COUNTY, WASHINGTON**

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Issued pursuant to
42 USC 4332(2) (c) and 23 USC 128(a)

**U S Department of Transportation
Federal Highway Administration (FHWA)
and**

Washington State Department of Transportation (WSDOT)

In accordance with the National Environmental Policy Act and subsequent implementing regulations of the Council on Environmental Quality (40 CFR §1500-1508) and 23 CFR §771 the Federal Highway Administration has determined the selected alternative to be the I-5, SR 502 Interchange project located along the I-5 corridor, roughly 9 miles north of Vancouver, 5 miles west of Battle Ground and 2 miles south of Ridgefield. This alternative is not a federal action that significantly affects the quality of the human environment. The EA has been independently evaluated and determined to adequately and accurately discuss the purpose and need, environmental issues, and potential impacts of the proposed action with appropriate mitigation measures. Therefore, the action will not require the preparation of an Environmental Impact Statement (EIS). FHWA takes full responsibility for the accuracy, scope, and content of the Environmental Assessment for this proposed action.

Oct. 12, 2005
Date of Approval

Steve Saxton
Steve Saxton
Area Engineer, Washington Division
Federal Highway Administration

The following persons may be contacted for additional information concerning this document:

Steve Saxton
Area Engineer, Washington Division
Federal Highway Administration
711 S. Capitol Way, Suite 501
Olympia, Washington 98501

Becky Michaliszyn
Environmental Manager
Washington State Department of Transportation
11018 NE 51st Circle
Vancouver, WA 98668

PURPOSE

The project involves the construction of an interchange connecting I-5 and SR 502, located roughly 9 miles north of Vancouver, 5 miles west of Battle Ground and 2 miles south of Ridgefield. Construction activity, related to this action, is anticipated to occur in 2007 and 2008.

The proposed I-5, SR 502 Interchange project will reduce congestion and improve safety on I-5, NE 10th Avenue, and existing SR 502, and provide more direct access to Battle Ground and north Clark County. Construction activities include providing a new interchange connecting I-5 and SR 502 in north Clark County by extending SR 502 from Duluth to I-5 and building new and modifying existing on- and off-ramps at the I-5 northbound Gee Creek rest area.

PUBLIC INVOLVEMENT

Between 2003 and 2005, WSDOT conferred with federal, state and local agencies, as well as local elected officials and private groups interested in the proposed I-5, SR 502 Interchange Project. Formal public consultation began in October 21, 2003 with an Open House/Scoping Meeting at the Battle Ground Chamber of Commerce in Battle Ground, Washington, to discuss the preparation of an environmental assessment for the potential project. Three additional public Open Houses were held on March 25, 2004 at the Battle Ground High School cafeteria in Battle Ground, Washington, March 24, 2005 at the WSDOT Southwest Region office in Vancouver, Washington, and September 1, 2005 at the Battle Ground High School cafeteria in Battle Ground, Washington. Each Open House was well attended by the public. Per their request, agencies, organizations, jurisdictions, neighborhoods, businesses and other groups were given separate project briefings in May, August, and November of 2004. Newsletters, postcards and a website were also used to communicate project information to the public. A Notice of Availability of the Environmental Document was published in *The Columbian* and *The Reflector* on August 17, 2005.

Comments on the EA were due after a 30-day review period ending on September 16, 2005. Comments were incorporated into the EA, as appropriate, and responded to in writing. Letters were sent by WSDOT to all individuals and agencies providing comments on the EA, and are included within the project file.

MAJOR ENVIRONMENTAL ISSUES

The EA covered required areas as stipulated under CEQ regulations and NEPA. The following summarizes the environmental compliance activities of the major issues.

Right-of-Way Acquisition and Displacements

In accordance with Title 23 CFR §635.309 (c), prior to federal construction authorization, WSDOT will certify that right of way (ROW) was acquired in accordance with current FHWA Directives, relocation procedures, and consistent with Uniform Relocation Act requirements.

Land Use – Prime Farmland

The project complies with all US Department of Agriculture Natural Resource Conservation Service requirements for conversion of prime farmland to non-agricultural uses.

Fish/Wildlife/ESA

In accordance with the Endangered Species Act (ESA), endangered and threatened species were evaluated using a biological assessment (BA). The BA was circulated to NOAA Fisheries and the U.S. Fish and Wildlife Service (USFWS) consistent with Section 7 consultation procedures.

The BA concluded the project “may affect, but not likely to adversely affect” for the following species under the United States Fish and Wildlife Service (USFWS) jurisdiction: Bald Eagle, Golden Paintbrush and Nelson’s Checker-mallow. The USFWS provided a concurrence letter on July 12, 2005 for the BA effect determinations and proposed conservation measures.

The BA concluded the project “may affect, but not likely to adversely affect” for the following species under NOAA fisheries jurisdiction: Lower Columbia River Chinook, Coho Salmon, Lower Columbia River Steelhead, and to proposed Lower Columbia River Steelhead Critical Habitat. NOAA fisheries concurred with the BA effect determination on August 2, 2005 and provided conservation measures within their letter, attached as part of the EA appendices.

The conditions provided by NOAA fisheries and USFWS will be adhered to during project construction.

Wetlands

All wetland mitigation will satisfy the requirements of Executive Order 11900 which states that the project must include all practicable measures to minimize harm, and addresses applicable provisions of the Section 404 (b) (1) guidelines of the Clean Water Act.

Coordination with appropriate agencies will occur on mitigation elements during the permitting phase of the project.

Water Quality

The selected action will be constructed consistent with the most current WSDOT Highway Runoff Manual requirements, WSDOE guidelines, and other federal Clean Water Act standards. Appropriate best management practices (BMPs) will be used during construction to minimize impacts.

Historic Resources (Section 106 of NHPA)

In correspondence dated April 14, 2005 and May 25, 2005, the Washington Office of Archaeology and Historic Preservation (OAHP) concurred that this project will have an adverse affect upon one National Register Eligible historic property. In addition to consulting with the OAHP, WSDOT and FHWA conferred with the Cowlitz Indian tribe. The project will adhere to the stipulations of the *Memorandum of Agreement between Federal Highway Administration, Washington State Department of Transportation, Washington State Department of Archaeological and Historic Preservation and Cowlitz Indian Tribe regarding the Interstate 5 and State Route 502 Interchange Project, Clark County Washington* dated May 11, 2005.

Environmental Justice

In accordance with Executive Order 12898, this project will not have a disproportionately high and adverse effect on minority and/or low-income populations.

Environmental commitments will be implemented as described within the EA.

CONCLUSION

FHWA has determined the selected alternative, described as the proposed action within the EA, has no significant impacts on the human environment and does not require an EIS. FHWA takes full responsibility for the accuracy, scope, and content of the EA for this selected action.

Attachments

The Environmental Assessment is incorporated by reference into this FONSI. Copies of the EA are available on request from Becky Michaliszyn, Environmental Manager, Southwest Region of the WSDOT; PO Box 1709, Vancouver, WA 98668-1709 (telephone 360-905-2174).

The following attachments are incorporated into this FONSI:

1. Errata to the Environmental Assessment
2. "Notice of Availability of FONSI" and "Notice of Adoption of EA under SEPA" with publication listing.
3. FONSI Distribution List
4. Mitigation Commitment list
5. Written Comments with Responses

Attachment 1 - Errata to Environmental Assessment

Page 3-1 caption to bottom picture should read: “PM peak traffic at Duluth.” instead of “PM peak traffic at Duluth Corners.”

Page 3-62 an additional note attached to Exhibit 3-21 should read: “The growth noted for the City of Vancouver is a result both of population increase and annexation, with the majority of that growth in the 1990’s being due to annexation. In 1995, the City of Vancouver population was 68,589. In 1996, the city annexed a large area of unincorporated, urban Clark County, which is reflected in the 2000 population number. From 1990 to 2000, the city’s reported population increased by 97,180 people but in the prior 10 years (1980 to 1990) the city’s population only increased by 3,546.”

Page 3-78 should include a sidebar that reads:

Humans Perception of Changes in Sound Levels

- A 2 to 3 dBA change is the smallest perceivable change
- A 5 dBA change is readily perceived
- A 10 dBA change is perceived as a doubling or half the sound level

Page ES – 7 and 3-79, first sentence in the “What is feasible and reasonable?” sidebar should read: “Reasonable refers to the maximum planning level cost per residence benefiting from the noise mitigation allowed under WSDOT policy. Allowable costs are totaled and compared to the planning level cost of the wall.”

Page 1-3, second paragraph, strike last sentence: ~~“C-TRAN proposes to eliminate this service in September 2005.”~~

Attachment 2 – Notice of Availability of FONSI and Notice of Adoption of EA under SEPA with publication listing



Washington State
Department of Transportation

NOTICE OF AVAILABILITY OF THE FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF ADOPTION OF EA UNDER SEPA

Purpose of Notice: This notice is published to notify interested citizens and others that the Federal Highway Administration (FHWA) has issued a determination of Finding Of No Significant Impacts (FONSI). This finding is based upon the evaluation of the Environmental Assessments (EA) as issued on August 17, 2005, for the Interstate 5 (I-5), State Route 502 (SR 502), Interchange Project, Clark County

In addition, this notice advised interested citizens and others that the WSDOT has adopted the NEPA EA under State Environmental Policy Act (SEPA) rules.

Description of Proposed Project: This project would construct an interchange connecting I-5 and SR 502, located roughly 9 miles north of Vancouver, 5 miles west of Battle Ground and 2 miles south of Ridgefield.

Copies of the FONSI and the SEPA Adoption Notice are available from Environmental Mgr, Becky Michaliszyn at WSDOT SW Region, PO Box 1709, Vancouver, WA 98668-1709.

The FONSI and the SEPA Adoption Notice will also be available for review at the Battle Ground Community Library, Ridgefield Community Library, Washington State Library and at the WSDOT facility at 11018 NE 51st Circle, Vancouver, WA.

Persons with disabilities may request this information be prepared and supplied in alternate formats by calling the Washington State Department of Transportation at (360) 705-7097. Persons who are deaf or hard of hearing may call access Washington State Telecommunications Relay Service by dialing 7-1-1 and asking to be connected to (360) 705-7097.

The FHWA and WSDOT assure full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination based on race, color, national origin and sex in the provision of benefits and services.

The Notice of Availability of the FONSI and the Notice of Adoption of the EA under SEPA rules will be advertised in the following newspapers:

- Battle Ground *The Reflector* (legal)
- Vancouver *The Columbian* (legal)

Attachment 3 – FONSI Distribution List

Federal

- U.S. Army Corps of Engineers
- U.S. Department of Commerce, NOAA Fisheries, National Marine Fisheries Service
- U.S. Department of the Interior, Fish and Wildlife Service
- U.S. Environmental Protection Agency
- US Department of Agriculture Natural Resource Conservation Service

Tribes

- Cowlitz Indian Tribe

State

- Department of Ecology
- Department of Fish and Wildlife
- Department of Community Development
- Office of Archaeology and Historic Preservation
- Department of Agriculture
- Department of Health
- Department of Natural Resources
- Department of Parks and Recreation
- Department of Social and Health Services
- Washington State Patrol District 5
- Washington State Library

Regional

- Clark County
- City of Battle Ground
- City of La Center
- City of Ridgefield
- C-Tran
- Port of Ridgefield
- Regional Transportation Council
- Ridgefield Community Library
- Battle Ground Community Library

Attachment 4

Mitigation Commitment List

Below are potential project mitigation commitments extracted from the Environmental Assessment (EA) on I-5/SR 502 Interchange Project. Page numbers in parentheses refer to the pages in the Environmental Assessment where the text may be found.

These recommended commitments are adopted as part of FHWA's final decision on the proposed action and are listed to "assist with agency planning and decision making" and to "aid an agency's compliance with NEPA when no environmental impact statement is necessary" [40 CFR 1501.3(b), 1508.9(a)(2)]

General (Page 5-1)

- Comply with *WSDOT Standard Specifications for Road, Bridge, and Municipal Construction* (WSDOT 2004b).

Transportation (Page 5-1)

Construction Commitments:

- Prepare a traffic management plan for construction prior to making any changes in traffic flow, including pedestrian and bicycle traffic. This plan should also include information on construction sequencing to reduce effects to traffic.
- Prepare a public relations plan to keep the public informed on construction activities.

Long-Term Commitments:

- Coordinate with Clark County to transfer the existing section of SR 502 from NE 10th Avenue to the new SR 502 connections between Duluth Corners and the new interchange.
- Reconfigure Gee Creek Rest Area pathway that was bisected by the northbound on-ramp to maintain a continuous path for pedestrian users at the rest area.

Right of Way Acquisition and Displacement (Page 5-1)

- Follow the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, for all residential and commercial displacements and real property acquisitions.

Wetlands, Fish and Wildlife, and Threatened and Endangered Species (Page 5-2)

Construction Commitments:

- Implement a site-specific TESC plan to minimize erosion and sedimentation.
- Install high visibility fencing around environmentally sensitive areas prior to construction to preserve them during construction.
- Comply fully with the terms and conditions of the Implementing Agreement between the Washington State Department of Ecology and the Washington State Department of Transportation Regarding Compliance with the State of Washington Surface Water Quality Standards.

Exhibit 5-1. Compensatory Wetland Mitigation Using Wetland Creation

Wetland Category	Acres Negatively Affected	Creation Only Ratio ¹	Acres Required ²
2	1.8	3:1	5.4
3	1.0	2:1	2.0
4	3.1	1.5:1	4.7
Total	5.9		12.1

¹ Ecology 2004

² Replacement acreage does not include required upland buffer acreage.

- Implement wetland mitigation in the Gee Creek watershed.
- Consolidate small impacts from throughout the project area into one or more wetland mitigation sites located to maximize environmental benefits, including replacing and increasing flood storage potential, providing recharge opportunities, improving water quality, and expanding wetland wildlife habitat.
- Treat stormwater and provide flow control consistent with the *Highway Runoff Manual* (WSDOT 2004a).
- Revegetate disturbed areas including cut and fill slopes, riparian areas, and wetlands with dense, native vegetation as appropriate to replace or enhance functions lost or negatively affected by construction. Planting trees of size comparable to the trees removed is not practicable.
- Mitigate the project's impact of approximately 6.1 acres of riparian vegetation by using a combination of preservation, enhancement, and creation.
- Implement measures to ensure the survival of plantings and success of mitigation plans.
- Minimize placement of permanent structures below the OHWM, or within associated wetland or riparian habitats.
- Comply with all conservation measures included in the biological assessment.
- Meet all stipulations issued by USFWS and NOAA Fisheries in the respective agencies' concurrence letter on the biological assessment (USFWS, July 2005; NOAA Fisheries, August 2, 2005).

Water Quality, Floodplains, and Hydrology (Page 5-5)

Construction Commitments:

- Implement a site-specific TESC plan to minimize erosion and sedimentation.
- Comply fully with the terms and conditions of the Implementing Agreement between the Washington State Department of Ecology and the Washington State Department of Transportation Regarding Compliance with the State of Washington Surface Water Quality Standards.

- Treat any sediment-laden wastewater produced by the project prior to discharge.
- Dispose waste (or excess) pavement, concrete, or other construction material at a permitted facility and place excess fill in lifts according to *WSDOT Standard Specifications for Road, Bridge, and Municipal Construction* (WSDOT 2004b).
- Restore disturbed areas outside the new lanes, ramps, shoulder, and other structures according to the WSDOT Roadside Classification Plan (WSDOT 1996).
- Locate staging areas above the ordinary high water mark and outside of environmentally sensitive areas.
- Avoid effects to wetlands that support populations of the state sensitive small-flowered trillium to the extent practicable.
- As part of wetland mitigation, design an intensive planting plan to provide quick cover and restore and enhance dense native wetland plant communities.
- Avoid direct effects to mainstem Gee Creek and adjacent wetlands by spanning Gee Creek and adjacent wetlands with a bridge.
- Use retaining walls to minimize unavoidable impacts to Gee Creek.
- Limit vegetation removal and retain large trees to the extent practicable. Protect root zones of trees that will be retained.
- Comply with the terms and conditions of the Hydraulic Project Approval set forth by the WDFW.
- Conduct in-water work (e.g. culvert replacement) during the in-water work window and/or under conditions of low flow.
- Limit disturbance of streambed and banks to that associated with culvert installation.

Long-Term Commitments:

- Use a combination of wetland preservation, wetland enhancement, and wetland creation (approximately 12.1 acres) to replace wetlands negatively affected within the project area following guidelines of Ecology, the Corps, Clark County, and WSDOT (Exhibit).

- Implement a site-specific SPCC plan to minimize spills and ensure all harmful materials are properly stored and contained.

Long-Term Commitments:

- Use design and construction standards outlined in the Highway Runoff Manual (2004a).
- Conduct routine inspections and maintenance for all stormwater facilities.

Historic, Cultural, and Archaeological Resources (Page 5-5)

Construction Commitments:

- Prior to construction activities, implement the stipulations of the *Memorandum of agreement between the Federal Highway Administration, Washington State Department of Transportation, Washington State Department of Archaeology and Historic Preservation, and the Cowlitz Indian Tribe Regarding the Interstate 5 and State Route 502 Interchange Project, Clark County Washington, August 11, 2005* (Appendix D) and associated treatment plan for the archaeological site (45CL631) that is eligible for listing on the National Register. In addition, site 45CL632 will be monitored during ground disturbing activities in areas of the site containing high density of archaeological deposits. A specific treatment plan was developed as part of the Memorandum of Agreement that specifies the research design, extent of data recovery, tribal coordination, laboratory analysis, discovery protocols, reporting, public dissemination, and artifact curation requirements to mitigate for adverse effects.
- Invite representatives of the Cowlitz Tribe to the site during excavations associated with implementing the Memorandum of Agreement.
- Notify OAHP, Cowlitz Indian Tribe, and other agencies as stipulated in the Memorandum of Agreement should previously unidentified cultural resources or human remains be encountered. Work in the immediate vicinity of the discovery would cease until the significance of the discovery could be evaluated and a course of action implemented. A specific protocol for the unanticipated discovery of human remains and funerary artifacts is included in the Memorandum of Agreement and would be followed in these situations.

Land Use (Page 5-6)

- Work with property and business owners in the project area to minimize conflicts and inconveniences from construction related activities, such as an increase in the level of noise, light, dust, and glare.
- Prepare a public relations plan to keep the public informed on construction activities.
- Comply with requirements of the applicable federal, state, and local land use and zoning regulations to ensure protection of land uses, protected resource lands, and environmentally sensitive areas.
- Minimize the conversion of prime farmland to non-agricultural uses.

Visual Quality (Page 5-7)

Construction Commitments:

- Encourage contractor to use already developed sites within the project limits, away from visually sensitive areas.
- To the extent practicable, contour material wasted within the project area in a way that provides visual continuity between various visual elements.
- To the extent practicable, shield construction lighting and/or focus it on work areas to minimize spillover of artificial light into adjacent areas.
- To the extent practicable, limit traffic stoppage and lane closures to off peak travel hours.

Long-Term Commitments:

- To the extent practicable, remove vegetation in a tapered manner to create a visual blending effect with existing natural elements such as forests.
- Design, color, and texturize new structures in a way that is consistent with other bridges and/or ramps along I-5. Revised Washington Gray is the standard pigment color treatment for highway bridges and structures; this color/texture would be consistent with the I-5 corridor and would be generally harmonious with both natural and urban surroundings.
- Implement the WSDOT Roadside Classification Plan policies pertinent to permanent vegetation restoration to blend disturbed areas with the surrounding landscape.

Economic Elements (Page 5-8)

Construction Commitments:

- Plan construction activities to allow reasonable access to commercial properties.
- Prepare and implement a public relations plan to coordinate construction activities with the businesses.
- To the extent practicable, time temporary road closures and utility shut-offs to minimize negative effects to area activities. For major utility shut-offs, provide advance notice and schedule during low use times.

Long-Term Commitments:

- Ensure that any displacements of businesses be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.
- Implement the access control described in the SR 5, SR 502 Interchange Vicinity Right of Way and Limited Access Plan.

Social Elements (Page 5-8)

Construction Commitments:

- Prepare and implement a public relations plan to coordinate construction activities with the community.
- Provide reasonable access to private residential and business properties during construction.
- To the extent practicable, time temporary road closures and utility shut-offs to minimize negative effects to area activities. For major utility shut-offs, provide advance notice and schedule during low use times.
- Implement measures for control of fugitive dust as described in Section 3.17, Air Quality.
- Implement measures to reduce construction-related noise as described in Section 3.16, Noise.
- Implement measures to reduce construction-related light and glare as described in Section 3.10, Visual Quality.

Hazardous Materials and Asbestos (Page 5-9)

Construction Commitments:

- Implement a site specific SPCC plan to minimize spills and ensure all harmful materials are properly stored and contained.
- Perform asbestos containing material (ACM) and lead based paint (LBP) surveys prior to construction to reduce the potential for releasing these contaminants into the environment during demolition activities.
- Incorporate underground storage tank (UST) decommissioning if necessary into construction specifications to reduce or eliminate future cleanup liability.
- Perform utility surveys to avoid damage to and potential releases from utilities during construction.
- Incorporate specifications for managing contaminated soil, water, and other materials into the construction contract.

Soils and Geology (Page 5-9)

Construction Commitments:

- Conduct a geotechnical evaluation to obtain sufficient information concerning potential geologic and soil hazards, including the potential for settling. Evaluate new information on soil conditions from this evaluation and take appropriate design measures to address any new risks. Provide information, including any boring logs, to the construction contractor.
- Take appropriate cautions if the project affects areas with marginal slope stability.
- Use current standard seismic designs and applicable building materials.

- Implement temporary and permanent standard erosion control measures as needed during all phases of construction including both vegetative controls and structural controls.
- Include additional mitigation measures, if necessary, when a more detailed construction and equipment staging plan is developed.

Long-Term Commitments:

- Follow the applicable WSDOT maintenance procedures for the new facility where appropriate and feasible.

Noise (Page 5-10)

Construction Commitments:

- Limit noisier construction activities, such as pile-driving, jack-hammering, and any blasting to between 7 a.m. and 10 p.m. to reduce construction noise levels during sensitive nighttime hours.
- Require contractors to use Occupational Safety and Health Administration (OSHA) - approved ambient sound-level sensing backup alarms during nighttime hours to reduce disturbances to nearby residents during quieter periods.
- To the extent practicable equip and maintain construction equipment engines with adequate mufflers to reduce their noise by 5 to 10 dBA (U.S. EPA 1971).
- Notify nearby residents in advance of any planned, controlled blasting activities.

Air Quality (Page 5-10)

Construction Commitments:

- Use water trucks to keep soils moist.
- Minimize areas of clearing and grubbing to a manageable size.

Attachment 5

Written Comments with Responses

Comment letters received on this environmental assessment (EA) are attached along with responses.

Comment letter #1 – Liane Carlson, WSDOT Title VI Coordinator – Ms. Carlson reviewed the EA and noted that the I-5/SR 502 interchange project incorporated the required ADA and Title VI language into the August 2005 newsletter. Ms. Carlson also commented that the project had met the requirements for Title VI of the Civil Rights Act of 1964, and the Executive orders for Environmental Justice and Limited English Proficiency. She had requested that we continue to include the ADA and Title VI in all of the project communication.

Response to Comment – We appreciate Ms. Carlson’s comments regarding the project’s commitments to ADA and Title VI. The project team will continue to make every effort to meet the requirements of the ADA and Title VI.

Comment letter #2 – Robert Schalk, citizen – Mr. Schalk expressed concerns that the EA did not assess the ability to widen I-5 at some time in the future because of the design and location of the interchange. Mr. Schalk also expressed concern that there were not enough environmental studies or assessments to ensure that a “west connection” to the interchange could be built. Mr. Schalk’s comments are reproduced below:

Comments regarding the SR 502 Interchange environmental assessment

The staff at the meeting was not able to assure me that the document assessed the ability to widen the I-5 Freeway at some future time because of the design and location of the interchange elements. This is important because most assuredly the freeway will need to be widened to at least 3 lanes in each direction within the next 20 years. The design of the interchange elements must not preclude that widening and needs to allow the widening with minimal reconstruction or reconfiguration of the roadway.

Response to Comment – WSDOT designed the I-5/SR 502 Interchange in anticipation that the freeway could someday be widened to four lanes in each direction. The I-5 over-crossing is designed to span the existing three lanes, the new collector-distributor, and includes space for the addition of a fourth lane in each direction in the median.

*Additionally, and probably even more important, is the need to confirm that the location of the west end of the freeway crossing alignment can be extended further to the west to connect to the adjacent local street system. This means that there is, in fact, enough assessment studies done to verify that there is no environmental or any other impediment that would preclude constructing an extension of Hwy 502 directly to the west. Apparently no study has been made to determine if there are no wetland, historical or archaeological, grave sites or any major construction constraints that would make the choice of one of the earlier interchange locations or configurations the better selection. I was told that a westerly extension of the State Hwy 502 was a county responsibility, and the State doesn’t need to be concerned about it. **THAT’S WRONG!** The interchange belongs to the State and Hwy 502 is a State highway and any extension to the west is still a piece of Hwy 502. Just because the county may not want to deal with the extension issue at this time does not eliminate the legal responsibility for the State to study the ability to provide the west extension in the future.*

This assessment document should not be accepted nor approved by the Federal agencies until the studies for the west extension are done and included in the document for review by the public. If not, then the document must include a full and detailed discussion including what laws and other legal resolutions will be used to justify not doing the assessment requested.

Response to Comment – In the EA, WSDOT did not study or determine an alignment for the potential west connection because this facility was not needed to satisfy the project's purpose and need, which addressed capacity at the NE 179th Street Interchange, safety on SR 502 (NE 10th Avenue between NE 179th Street and NE 219th Street), safety on I-5 (between the I-5/I-205 merge and the NE 179th Street Interchange), and system linkage and connectivity to Battle Ground and parts of north Clark County.

SR 502, as defined by R.C.W., begins at I-5 and ends at Battle Ground. There is no state route planned to go west, nor is there any legislation allowing or directing WSDOT to consider a state route to the west. The connection to the interchange from the west is also not identified on Clark County's comprehensive plan. Although there is speculation that a west connection may be included in the County's future comprehensive plan update, the types and locations of any updated road improvements is clearly unknown at this time. If the County chooses to build a west connection to the I-5/SR 502 Interchange, then the County would be the agency responsible for conducting and complying with all applicable environmental regulations to build a county-owned and maintained facility. Environmental studies in compliance with the Washington State Environmental Policy Act and other applicable federal, state and local regulations will need to be initiated by Clark County to determine the road alignment that avoids or minimizes impacts to environmental resources.

WSDOT addressed the possibility of Clark County building the west connection to the I-5/SR 502 Interchange in the EA to the extent information is known about this facility. Please refer to section 3.18 Indirect and Cumulative Effects section, page 3-84 and exhibit 3-30.

One final issue I think is important. The location of any storm water detention pond should be such that it is screened by pleasant landscaping from the traveled way so the public passing by do not have to see an unkempt tangle of wild brush and other vegetative weeds.

Response to Comment – WSDOT would implement the 1996 WSDOT Roadside Classification Plan policies pertinent to permanent vegetation restoration to blend disturbed areas with the surrounding landscape.

Comment letter #3 – Sherry Hardman – Citizen – Ms. Hardman expressed interest in obtaining any information of photos on the old buildings located on her property. Ms. Hardman noted she believed the house was built in 1963 and another building, believed to be an old filling station was built in 1953. Her comment is reproduced below:

I am interested in any photos or information (historical) on the old buildings on this property. I believe somewhere around 1953 it was a filling station, possibly groceries, and cabins for rent. The house was built maybe in 1963. Thanks for any info.

Response to Comment – The Clark County Historical Museum on 1511 Main Street has many historical photos and maps of Clark County. The Museum is operated by the Clark County Historical Society and can be contacted at 360-993-5679.

Comment letter #4 – Chet and Helen Byers – Citizen – Mr. and Ms. Byers expressed concerns with safety from vehicles entering their property and vibration/noise from the rumble strips along the roadway. The Byers' comments are reproduced below:

We have a safety concern. We have had 3 vehicles enter our property from the freeway. The latest happened in the latter part of 2004. The incident resulted in a building being demolished and vehicles in the yard being damaged. This was the south end. This happened another time and a car ended up in the front yard by the house on the north end. The only thing protecting us, if you can call it that, is a chain link fence. We need protection from the vehicles. If you put up concrete barricades please do not take the chain link fence down or we will have people in our yard all day wanting phones, gas or anything else.

Response to Comment – WSDOT will install a safety barrier along the auxiliary lane in the vicinity of the Byers' property. WSDOT will restore the right of way fencing along the new limit of the right of way.

The rumble strips, something should be done about them. They cause more noise. The dishes in our cupboards rattle and move to the edge of the shelves. We have cracks in our walls from the trucks hitting the rumble strips. It's tearing the buildings apart from the vibration.

Response to comment - Rumble strips are a safety feature that alerts drivers if their vehicle is veering off the road. WSDOT will continue to utilize rumble strips.

Comment letter #5 – Joanne Wright, WSDOT Noise and Air Quality – Ms. Wright provided the following comment on revising the air quality section of the EA:

On page 3-81, under "How was air quality evaluated...?" or, as a sidebar, provide one or two sentences about the model used for determining CO quantities. Similar to explaining how TNM is used for noise.

Response to Comment (pg 3-81)– Detailed discussion on the technical aspects of the air quality and noise analysis are contained in the technical reports, which are in an appendix to the EA (Please refer to the CD affixed on the EA back cover, Appendix B). The EA is written using WSDOT's recently adopted "Reader-Friendly Document Tool Kit," which aims to summarize key findings of the technical analysis in the EA and minimizing technical jargon and extensive technical detail. The intent of including the technical reports as an appendix allows those persons interested in the more technical aspects of a resource impact analysis the opportunity to review the technical analysis and methods.

Comment letter #6 – Joanne Wright, WSDOT Noise and Air Quality – Ms. Wright provided the following comments on revising the noise section of the EA:

This section should include a graphic showing the location of receptor location and noise mitigation considered for the project. Figure 7 or Figure 9 (they are the same) from the noise report could be added for this information.

Response to Comment – Exhibits in the technical report showing receptor locations and noise mitigation considered are not included in the EA because no mitigation was proposed. Noise levels are summarized in EA exhibit 3-26 on page 3-78 and described on the same page in the section titled "What long-term effects to noise would occur and what mitigation was

considered?" The noise technical report with Figures 7 and 9 (pages 32 and 45) is made available as an appendix to the EA (Appendix B Technical Reports).

This section should also include a table showing the receptors and modeled sound levels. Table 7 from the discipline report could be used. Columns 2, 4, and 6 could be taken out for brevity

Response to Comment – Table 7 (pg 34 of the technical report) showing the receptors and modeled sound levels is available in the noise technical report in Appendix B of the EA. Readers are referred to the noise technical report for a complete discussion on the noise analysis in the sidebar on page 3-77.

On page 3-79, a table showing the conclusion for each barrier should be included. Table 10 from the discipline report would suffice

Response to Comment – Detailed discussions of the technical analysis and conclusions are included in the noise technical report found in Appendix B of the EA. Persons interested in details of the noise study are referred to the noise technical report in the sidebar on page 3-77. On page 3-79, second paragraph, a statement that none of the mitigation measures (described in the previous paragraph) were warranted according to FHWA and WSDOT reasonable and feasible criteria.

On page 3-78 or 3-79, I suggest adding a sidebar that states how we perceive dBA level changes; ie. 3dBA is barely perceptible, 5 is readily perceptible, 10 is a doubling of sound etc.

Response to Comment – This suggested addition to page 3-78 will be included in the Errata to the EA.

On page 3-77, please add the TNM model used: ie TNM 2.5 so a reviewer would know that the version is current and for future reference.

Response to Comment – A discussion of TNM 2.5 is included in the technical report and included in Appendix B in the EA. Persons interested in details of the noise study are referred to the noise technical report in the sidebar on page 3-77.

Page 3-79, Reasonable/Feasible Sidebar: In the first sentence, please add "planning level" after "maximum". At the end of the first sentence in this sidebar, please add: "allowed under WSDOT policy. Allowable costs are totaled and compared to the planning level cost of the wall. "

Response to Comment – This suggested addition to pages ES – 7 and 3-79 will be included in the Errata to the EA.

Comment letter #7 – Richard H. Carson, Director of Clark County Community Development - Mr. Carson's comments are reproduced below:

The document's style of presentation and writing has set a new standard for effective communication to the public. Typically, environmental review documents meet the test of providing documentation of an effective environmental review but fail the test of being understood by those not familiar with the review of environmental documents. This particular environmental assessment notes that it has taken a different approach; that approach is particularly successful. The question and answer format conveys the necessary information in a very readable format easily accessed by the general public. We will be reviewing this style to see if it can be applied to other documents, like the County's comprehensive plan.

There appears to be a minor communication error in the caption of the photo on page 3-1 which describes "PM Peak traffic at Duluth Corners." The location is referred to as "Duluth," not "Duluth Corners" (which appears to be—a simple confusion with "Dollars Corner" – the intersection of state Route 502 with NE 72nd Avenue).

Response to comment – The caption including the intersection's name on page 3-1 will be corrected in the Errata to the EA.

There needs to be a clarifying note on Exhibit 3-21 which indicates population growth rate from 1990 to 2000. The growth noted for the City of Vancouver is a result both of population increase and annexation, with the majority of that growth in the 1990's being due to the latter. In 1995, the City of Vancouver population was 68,589. In 1996, the city annexed a large area of unincorporated, urban Clark County, which is reflected in the 2000 population number. From 1990 to 2000, the city's reported population increased by 97,180 people but in the prior 10 years (1980 to 1990) the city's population only increased by 3,546.

Response to comment (Exhibit 3-21, page 3-62)– The information that Mr. Carson supplied regarding the City of Vancouver's growth being in large part the result of annexation will be corrected in the Errata to the EA.

Comment letter #8 – Mark Cline, Washington State Department of Ecology – Mr. Cline's comment is reproduced below:

Based information provided in the EA, the proposed project would result in direct and indirect impacts to wetlands associated with Gee Creek. Any adverse impacts to wetlands on the site should be avoided and/or minimized to the fullest extent possible. If impacts to wetlands are unavoidable, we encourage you to contact the US Army Corps of Engineers to determine if a Section 404 permit is needed. Similarly, a Section 401 Water Quality Certification or Administrative Order from Ecology may also be needed. Please contact Ecology's staff, Mark Cline, to work with your staff to analyze unavoidable wetland impacts and discuss mitigation opportunities.

Response to comment – WSDOT will take efforts, as described in section 3.3 Wetlands, to minimize impacts to wetlands. WSDOT has proposed mitigation as outlined on page 3-18 and in Chapter 5 Environmental Commitments to address wetland impacts. WSDOT is coordinating with the US Army Corps of Engineers and Ecology on required permits and approvals.

Comment letter #9 –Dave Hurt, C-Tran Capital Projects Supervisor –. Mr. Hurt's comment is reproduced below:

Thank you for the opportunity to review and comment on the Environmental Assessment for the I-5/SR 502 Interchange Project. I can see that a tremendous amount of work has gone into the project already, with more to come.

After reading the document, I have attached a few comments. They obviously come from a point of view in favor of transit and a Park and Ride facility in the study area. I have discussed this with other staff members in the Washington Department of Transportation as well as at public meetings that have been held for this project. It's not a new concept, but one that I believe warrants consideration early in the process.

Please consider the comments provided and contact me if you have any questions. My phone number is (360) 906-7362, and my email is daveh@c-tran.org.

Page ES-2. There is no mention of traffic congestion or relief due to public transportation or a future Park and Ride in the vicinity. However, it does mention shared pedestrian and bicycle use. It seems there is no need to include pedestrian/bicycle amenities if there is no Park and Ride because there is no place to go from there except east to Battle Ground. Conceptually, it seems logical that a Park and Ride should be addressed as a future possibility in order to justify the pedestrian/bicycle use towards Interstate 5.

Response to comment – The EA included C-Tran's planned park and ride near Duluth as a part of the indirect and cumulative effects section beginning on page 3-84. Specific details of the planned park and ride facility are unknown at this time; thus, specific impacts, including how pedestrians and bicyclists would access the park and ride facility could not be addressed. WSDOT included pedestrian and bicycle facilities in the I-5/SR 502 Interchange project so that alternative transportation users would be accommodated, which would include those using public transportation or the planned park and ride.

Page ES-4. Traffic and Transportation. Pedestrian and bicycle facilities to Interstate 5 with no Transit Center? Congestion decreases with no Park and Ride? Again, it is worth mentioning that the addition of a Park and Ride and Transit Center in the vicinity will only add to the decreased congestion, especially as further development of residential housing takes place in the northern Clark County region. Also, pedestrian/bicycle facilities in the area need to have a destination that will allow for continued travel. That needs to be a Transit Center because there will be no opportunity for pedestrian/bicycle travel into Vancouver or Portland from the Gee Creek area. A Park and Ride needs to be included in the discussion as a possibility in the future.

Response to comment – A park and ride facility was considered as a planned project in the cumulative effects analysis found on page 3-84. However, there is little known about the type and location of such a facility. When a specific site is chosen for the planned park and ride facility, applicable environmental analysis will need to be conducted by the agency proposing to build the park and ride. During that analysis, the issues mentioned in the above comment can be specifically addressed.

Page I-3. "C-TRAN proposes to eliminate this service in September 2005." Before including this statement in the report, wait until after the election of September 20, 2005. After that date, we will know what is factual and what the routes in operation will be.

Response to comment (pg 1-3) – Based on the results of the September 20, 2005 election, it is now known that this service will not be eliminated. A correction to the EA will be made in the Errata to the EA.

Page 2-6. As mentioned previously, the concept for a Park and Ride needs to be addressed in this report. If that is the case, then there should be considerations for access control along SR 502 for buses and cars to ingress and egress the facility. There is, currently, no determination of where that site should be. However, if it is developed in the study area at a future date, access needs to be provided.

Response to comment (page 2-6)– At the time the I-5/SR 502 Interchange EA was prepared, specific type and location of a planned park and ride facility was not know. When a specific site is chosen for such a facility, WSDOT will coordinate with C-Tran to address how buses and cars would enter and exit the park and ride facility if located along SR 502. Access control along SR 502 is managed by WSDOT and would be coordinated through WSDOT's Access and Hearings Unit.

Page 3-4. A Park and Ride would increase the opportunities for pedestrian and bicycle access and use. It would be a destination that would allow further destination opportunities and modes of travel. That needs to be a consideration.

Response to comment – A park and ride facility was considered as a planned project in the cumulative effects analysis found on page 3-84. As stated above, when a specific site is chosen for the planned park and ride facility, applicable environmental analysis will need to be conducted by the agency proposing to build the park and ride. During that analysis, the issues mentioned in the above comment can be specifically addressed.

Comment letter #10 –Dave Hurt, C-Tran Capital Projects Supervisor – Mr. Hurt followed up with his previous comment, and his subsequent comment is reproduced below:

I wanted to follow up on my comments on the EA previously submitted. At that time I had a comment concerning transit service based on a statement on page 1.3.

Page 1-3. "C-TRAN proposes to eliminate this service in September 2005." Before including this statement in the report, wait until after the election of September 20, 2005. After that date, we will know what is factual and what the routes in operation will be.

Based on the results of the election on September 20, 2005, C-TRAN expects the current service to remain in place. There are no plans to eliminate route 173.

Response to comment (Page 1-3) – A correction to the EA will be made in the Errata to the EA.

**Attachment 6 – Copy of Original Comments (letters, emails,
comment forms)**

-----Original Message-----

From: Carlson, Liane
Sent: Monday, August 29, 2005 9:35 AM
To: Michalyszyn, Becky
Subject: I-5, SR 502

I reviewed the I-5, SR 502 Interchange Project in Clark County.

WSDOT NEWS - August 2005 - Noted that the SR502 Project News incorporated the required ADA and Title VI language into the newsletter.

WSDOT appreciates your commitment to diversity and non-discrimination in the development of this project and have now met the requirements for Title VI of the Civil Rights Act of 1964, and the Executive orders for Environmental Justice and Limited English Proficiency.

Please continue to include the ADA and Title VI notices in all of the project communications.

Thank you for this opportunity to review your Environmental Assessment.

Liane Carlson
Title VI Coordinator
Office of Equal Opportunity
(360) 705-7098
(360) 705-6801 Fax
E-mail: carlsol@wsdot.wa.gov



Washington State
Department of Transportation

SR 502 Interchange

Open House for Environmental Assessment
Thursday, September 1, 2005

Comment Form

The purpose of this WSDOT open house is to give the community an opportunity to meet with the I-5/SR 502 Interchange project team and to review and comment on the Environmental Assessment. Written comments can be submitted at tonight's open house or they can be sent by mail or e-mail to the project contact listed below. In order to be included as part of the formal comment period, comments must be received by the Washington State Department of Transportation by September 16.

See Reverse Side for Comments -

Name: ROBERT SCHALK (over for additional space)

Address: [REDACTED] [REDACTED]
Street/PO Box City/State Zip Code

Phone (optional): --- E-mail (optional): ---

Project Contact:

Becky Michaliszyn, Regional Environmental Services Manager
WSDOT Southwest Regional Office
PO Box 1709
Vancouver, Washington 98668-1709
E-mail: michalb@wsdot.wa.gov

For continued updates and additional project information, please visit the project Web site:
www.wsdot.wa.gov/projects/SR502/Interchange

The EA may be purchased for \$10 or project information may be reviewed and/or copied at the WSDOT

Comments regarding the SR 502 Interchange environmental assessment

The staff, at the meeting, was not able to assure me that the document assessed the ability to widen the I-5 Freeway at some future time because of the design and location of the interchange elements. This is important because most assuredly the freeway will need to be widened to at least 3 lanes in each direction within the next 20 years. The design of the interchange elements must not preclude that widening and needs to allow the widening with minimal reconstruction or reconfiguration of the roadway.

Additionally, and probably even more important, is the need to confirm that the location of the west end of the freeway crossing alignment can be extended further to the west to connect to the adjacent local street system. This means that there is, in fact, enough assessment studies done to verify that there is no environmental or any other impediment that would preclude constructing an extension of Hwy. 502 directly to the west. Apparently no study has been made to determine if there is no wetland, historical or archeological, grave sites or any major construction constraint that would make the choice of one of the earlier interchange locations or configurations the better selection. I was told that a westerly extension of the State Hwy. 502 was a county responsibility, and the State doesn't need to be concerned about it. **THAT'S WRONG!** The interchange belongs to the State, and Hwy 502 is a State highway and any extension to the west is still a piece of Hwy. 502. Just because the county may not want to deal with the extension issue at this time does not eliminate the legal responsibility for the State to study the ability to provide the west extension in the future.

This assessment document should not be accepted nor approved by the Federal agencies until the studies for the west extension are done and included in the document for review by the public. If not, then the document must include a full and detailed discussion including what laws and other legal resolutions will be used to justify not doing the assessment requested.

One final issue I think is important. The location of any storm water detention pond should be such that it is screened by pleasant landscaping from the traveled way so the public passing by do not have to see an unkempt tangle of wild brush and other vegetative weeds.



Washington State
Department of Transportation

SR 502 Interchange Project

Open House for Environmental Assessment
Thursday, September 1, 2005

Comment Form

The purpose of this WSDOT open house is to give the community an opportunity to meet with the I-5/SR 502 Interchange project team and to review and comment on the Environmental Assessment. Written comments can be submitted at tonight's open house or they can be sent by mail or e-mail to the project contact listed below. In order to be included as part of the formal comment period, comments must be received by the Washington State Department of Transportation by September 16.

I am interested in any photos or information historical on the old buildings on this property.

I believe somewhere around 1953. It was a filling station, possible groceries, and cabins for rent. The house was built maybe in 1963.

Thanks for any info

(over for additional space)

Name:

SHARRY HARDMAN

Address:

Street/PO Box

City/State

Zip Code

Phone (optional)

E-mail (optional):

Project Contact:

Becky Michaliszyn, Regional Environmental Services Manager
WSDOT Southwest Regional Office
PO Box 1709
Vancouver, Washington 98668-1709
E-mail: michalb@wsdot.wa.gov

For continued updates and additional project information, please visit the project Web site:
www.wsdot.wa.gov/projects/SR502/Interchange

The EA may be purchased for \$10 or project information may be reviewed and/or copied at the WSDOT Southwest Regional Office, 11018 NE 51st Circle, Vancouver, Washington, or by calling Becky Michaliszyn at 360-905-2174.



Washington State
Department of Transportation

SR 502 Interchange Project

Open House for Environmental Assessment
Thursday, September 1, 2005

Comment Form

The purpose of this WSDOT open house is to give the community an opportunity to meet with the I-5/SR 502 Interchange project team and to review and comment on the Environmental Assessment. Written comments can be submitted at tonight's open house or they can be sent by mail or e-mail to the project contact listed below. In order to be included as part of the formal comment period, comments must be received by the Washington State Department of Transportation by September 16.

We have a safety concern. We have had 3 vehicles enter our property from the Freeway - The latest happened in the latter part of 2004 - The incident resulted in a building being demolished and vehicles in the yard being damaged. This was the South end. This happened another time and a car ended up in the front yard by the house on the north end. The only thing protecting us, if you can call it that is a chain link fence. We need protection from the vehicles. If you put up concrete Barricades please do not take

(over for additional space)

Name: Chet and Helen Byers

Address:

Street/PO Box

City/State

Zip Code

Phone (optional):

E-mail (optional):

Project Contact:

Becky Michaliszyn, Regional Environmental Services Manager
WSDOT Southwest Regional Office
PO Box 1709
Vancouver, Washington 98668-1709
E-mail: michalb@wsdot.wa.gov

For continued updates and additional project information, please visit the project Web site:
www.wsdot.wa.gov/projects/SR502/Interchange

The EA may be purchased for \$10 or project information may be reviewed and/or copied at the WSDOT Southwest Regional Office, 11018 NE 51st Circle, Vancouver, Washington, or by calling Becky Michaliszyn at 360-905-2174.

The Chain link fence around...
people in our yard all day wanting phones,
gas or anything else.

The Rumble strips, something should be done
about them. They cause more noise.

The dishes in our cupboards Rattle, and
move to the edge of shelves - we have cracks
in our walls from the trucks hitting the
Rumble strips. Its tearing the buildings apart
from the vibration.

-----Original Message-----

From: Wright, Joanne
Sent: Friday, September 16, 2005 12:47 PM
To: Michaliszyn, Becky
Cc: Maas, John
Subject: I-5 SR 502 Interchange

Hi Becky:

I have reviewed the EA for this project. It looks good. I've got a few comments contained in the following comment sheets.

Please forward these to the appropriate person, if necessary.



AIR QUALITY EA NOISE EA Comment
Comment Form 9 ... Form.xls

Please call if you have any questions.

Thanks,

Joanne Wright

Air Acoustics and Energy Program

Washington State Department of Transportation

Phone: 206.440.4511

Fax: 206.440.4805

Contract: I-5/SR 502 Interchange		Environmental Assessment Air Quality Section		Date: 9/16/2005	
Reviewer: Joanne Wright		Page: Of: /Of:			
Comment No.	Reference	Review Comment	Status Code	Response	Response Action Verified

Under "How was air quality evaluated...?" or, as a sidebar, provide one or two sentences about the model used for determining CO quantities. Similar to explaining how TNM is used for noise.

Contract: I-5/SR 502 Interchange		Environmental Assessment Noise Section		Date: 9/16/2005	
Reviewer: Joanne Wright					
Comment No.	Reference	Review Comment	Page: /Of:	Status Code	Response Action Verified

This section should include a graphic showing the location of receptor location and noise mitigation considered for the project. Figure 7 or Figure 9 (they are the same) from the noise report could be added for this information.

1

This section should also include a table showing the receptors and modeled sound levels. Table 7 from the discipline report could be used. Columns 2,4, and 6 could be taken out for brevity.

2

A table showing the conclusion for each barrier should be included. Table 10 from the discipline report would suffice.

3

I suggest adding a sidebar that states how we percieve dBA level changes; ie. 3dBA is barely perceptable, 5 is readily perceptable, 10 is a doubling of sound etc.

4

Please add the TNM model used: ie TNM 2.5 so a reviewer would know that the version is current and for future reference.

5

In the first sentence, please add "planning level" after "maximum". At the end of the first Reasonable/Feasible sentence in this sidebar, please add: "allowed under WSDOT policy. Allowable costs are totaled and compared to the planning level cost of the wall."

7



proud past, promising future

CLARK COUNTY
WASHINGTON

COMMUNITY DEVELOPMENT

ADMINISTRATION

September 16, 2005

Becky A. Michaliszyn
Regional Environmental Manager
WSDOT, Southwest Region
PO Box 1709
Vancouver WA 98668-1709

**RE: I-5, SR 502 Interchange Project Environmental
Assessment Comments**

Dear Becky Michaliszyn:

Thank you for the opportunity to comment on the environmental assessment issued for the Interstate 5 / State Route 502 Interchange Project. Based on our review, we offer the following comments:

1. The document's style of presentation and writing has set a new standard for effective communication to the public. Typically, environmental review documents meet the test of providing documentation of an effective environmental review but fail the test of being understood by those not familiar with the review of environmental documents. This particular environmental assessment notes that it has taken a different approach; that approach is particularly successful. The question and answer format conveys the necessary information in a very readable format easily accessed by the general public. We will be reviewing this style to see if it can be applied to other documents, like the County's comprehensive plan.
2. There appears to be a minor communication error in the caption of the photo on page 3-1 which describes "PM Peak traffic at Duluth Corners." The location is referred to as "Duluth," not "Duluth Corners" (which appears to be a simple confusion with "Dollars Corner" - the intersection of State Route 502 with NE 72nd Avenue).
3. There needs to be a clarifying note on Exhibit 3-21 which indicates population growth rates from 1990 to 2000. The growth noted for the City of Vancouver is a result both of population increase and annexation, with the majority of that growth in the 1990's being due to the latter. In 1995, the City of Vancouver population was 68,589. In 1996, the city annexed a large area of unincorporated, urban Clark County, which is reflected in the 2000 population number. From 1990 to 2000, the city's reported population increased by 97,180 people but in the prior 10 years (1980 to 1990) the city's population only increased by 3,546.

Becky A. Michaliszn, WSDOT
Comments on I-5/SR 502 Interchange Project Environmental Assessment
September 16, 2005 Page 2

If you or other WSDOT staff would like to discuss our comments on the environmental assessment, please contact Evan Dust, Long Range Planning, (360) 397-2375 ext. 4913.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Carson", with a stylized, flowing script.

Richard H. Carson
Director

RHC:EPD:EPD:epd

C: Bill Barron, County Administrator
Pete Capell, Public Works Director

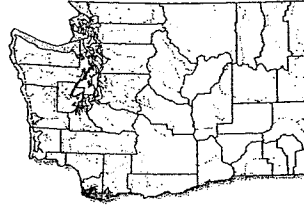


STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

September 16, 2005

Ms. Becky Michaliszyn
Regional Environmental Manager
Department of Transportation
P.O. Box 1709
Vancouver, WA 98668-1709



Your address
is in the
**Salmon-
Washougal**
watershed

Dear Ms. Michaliszyn:

Thank you for the opportunity to comment on the Environmental Assessment (EA) for the proposed I-5, State Route 502 Interchange Project, located in Clark County, Washington. We reviewed the environmental checklist and have the following comments:

WETLANDS: Mark Cline (360) 407-7273

Based information provided in the EA, the proposed project would result in direct and indirect impacts to wetlands associated with Gee Creek. Any adverse impacts to wetlands on the site should be avoided and/or minimized to the fullest extent possible. If impacts to wetlands are unavoidable, we encourage you to contact the U.S. Army Corps of Engineers to determine if a Section 404 permit is needed. Similarly, a Section 401 Water Quality Certification or Administrative Order from Ecology may also be needed. Please contact Ecology's staff, Mark Cline, to work with your staff to analyze unavoidable wetland impacts and discuss mitigation opportunities

If you have any questions or would like to respond to these comments please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(LMC: 05-6453)

cc: Mark Cline, SEA/WET





*Serving The Public Transit Needs
Of Clark County, Washington*

39952/DH/cb

September 16, 2005

Becky Michaliszyn, Environmental Manager
Department of Transportation
11018 NE 51st Circle
Vancouver, WA 98682-6686

RE: I-5/SR 502 Interchange Project Environmental Assessment

Dear Ms. Michaliszyn,

Thank you for the opportunity to review and comment on the Environmental Assessment for the I-5/SR 502 Interchange Project. I can see that a tremendous amount of work has gone into the project already, with more to come.

After reading the document, I have attached a few comments. They obviously come from a point of view in favor of transit and a Park and Ride facility in the study area. I have discussed this with other staff members in the Washington Department of Transportation as well as at public meetings that have been held for this project. It's not a new concept, but one that I believe warrants consideration early in the process.

Please consider the comments provided and contact me if you have any questions. My phone number is (360) 906-7362, and my email is daveh@c-tran.org.

Thank you.

Sincerely,

Dave Hurt
Capital Projects Supervisor

Attachment

c: John Hoefs, Director of Maintenance, Development & Technology
Ed Pickering, Senior Planner

**COMMENTS ON THE ENVIRONMENTAL ASSESSMENT
FOR THE I-5/SR 502 INTERCHANGE PROJECT**

Page ES-2. There is no mention of traffic congestion or relief due to public transportation or a future Park and Ride in the vicinity. However, it does mention shared pedestrian and bicycle use. It seems there is no need to include pedestrian/bicycle amenities if there is no Park and Ride because there is no place to go from there except east to Battle Ground. Conceptually, it seems logical that a Park and Ride should be addressed as a future possibility in order to justify the pedestrian/bicycle use towards Interstate 5.

Page ES-4. Traffic and Transportation. Pedestrian and bicycle facilities to Interstate 5 with no Transit Center? Congestion decreases with no Park and Ride? Again, it is worth mentioning that the addition of a Park and Ride and Transit Center in the vicinity will only add to the decreased congestion, especially as further development of residential housing takes place in the northern Clark County region. Also, pedestrian/bicycle facilities in the area need to have a destination that will allow for continued travel. That needs to be a Transit Center because there will be no opportunity for pedestrian/bicycle travel into Vancouver or Portland from the Gee Creek area. A Park and Ride needs to be included in the discussion as a possibility in the future.

Page 1.3. "C-TRAN proposes to eliminate this service in September 2005." Before including this statement in the report, wait until after the election of September 20, 2005. After that date, we will know what is factual and what the routes in operation will be.

Page 2.6. As mentioned previously, the concept for a Park and Ride needs to be addressed in this report. If that is the case, then there should be considerations for access control along SR 502 for buses and cars to ingress and egress the facility. There is, currently, no determination of where that site should be. However, if it is developed in the study area at a future date, access needs to be provided.

Page 3.4. A Park and Ride would increase the opportunities for pedestrian and bicycle access and use. It would be a destination that would allow further destination opportunities and modes of travel. That needs to be a consideration.

-----Original Message-----

From: Dave Hurt [mailto:DaveH@c-tran.org]

Sent: Wednesday, September 21, 2005 3:40 PM

To: MichalB@wsdot.wa.gov

Subject: I-5/SR 502 Interchange Project - Followup

Becky,

I wanted to follow up on my comments on the EA previously submitted. At that time I had a comment concerning transit service based on a statement on page 1.3.

Page 1.3. "C-TRAN proposes to eliminate this service in September 2005." Before including this statement in the report, wait until after the election of September 20, 2005. After that date, we will know what is factual and what the routes in operation will be.

Based on the results of the election on September 20, 2005, C-TRAN expects the current service to remain in place. There are no plans to eliminate route 173.

If you have any questions, please give me a call.

Thank you,

Dave Hurt